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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
AMBER REED CORP. and CONSULTORA KILSER
S.A.,

Plaintiffs,

-against-

THE REPUBLIC OF ARGENTINA,

Defendant.
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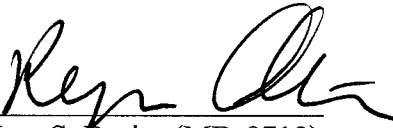
: **NOTICE OF MOTION**
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PLEASE TAKE NOTICE THAT upon the annexed the declarations of Maria Isabel Diaz Garcia, President of plaintiff Amber Reed Corp., dated April 13, 2008, with an annexed exhibit, Omar Angel Catulo, representative of plaintiff Consultora Kilser S.A., dated April 22, 2008, with an annexed exhibit, and Regina Alter, dated May 13, 2008, with annexed exhibits; the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Plaintiffs summary judgment as against defendant the Republic of Argentina, to strike defendant's discovery requests, and for such other

relief as the Court deems just and proper.

Dated: New York, New York
May 13, 2008

DREIER LLP

By: 

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